



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 16, 2005

Mr. Joseph R. Metzger, Treasurer
8th District Republican Committee (VA)
2236 Pimmit Run Lane #203
Falls Church, VA 22043

**Response Due Date:
December 16, 2005**

Identification Number: C00043919

Reference: Amended April Quarterly Report (1/1/05-3/31/05), received 4/18/05

Dear Mr. Metzger:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule H3 of your report discloses \$-6,100 for an apparent "return of an incorrect transfer from August, 2004." Please clarify whether your committee's federal account is reimbursing its non-federal account for shared allocable expenses. Please be advised, the non-federal account is prohibited from paying the federal account's share of these expenses. These types of costs must be paid according to the allocation ratio derived from the appropriate method on Schedule H1.

If the transfer(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If your non-federal account has been reimbursed for any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §§106.6 and 106.7 and establish procedures to insure future compliance with allocation regulations. Although the Commission may take further legal action regarding this activity, your prompt action will be taken into consideration.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. For State, District and Local party committees, Schedule H1 must be filed in the first report each calendar year that

discloses an allocable disbursement and for Separate Segregated Funds and Non-connected committees, in each report that discloses an allocable disbursement for administrative expenses, generic voter drives or public communications that refer to any political party, but do not refer to any clearly identified candidates.

Further, for State, District and Local party committees, all shared administrative, generic voter drive and exempt activity costs incurred during the two-year cycle must be allocated according to the appropriate fixed ratio, unless the federal account elects to pay a higher percentage of its cost. For Separate Segregated Funds and Non-connected committees, administrative expenses, generic voter drive costs and expenses related to public communications referencing any political party committee (but no clearly identified candidates) must be allocated according to a 50% flat minimum federal percentage unless the federal account elects to pay a higher cost. 11 CFR §106.7(d)(2), (d)(3) and 11 CFR §§104.10(b)(1) and 106.6(c)

-State, district and local party committees that make expenditures and disbursements in connection with both federal and non-federal elections for activities that are not federal election activities pursuant to 11 CFR §100.24 may use only funds subject to the prohibitions and limitations of the Act, or they may allocate such expenditures and disbursements between their federal and their non-federal accounts. 11 CFR §106.7(b)

State, district and local party committees may pay administrative, generic voter drive and exempt activity expenses from their federal account, or allocate between their federal and non-federal accounts according to a fixed percentage selected on FEC Schedule H1, except for activity directly attributable to a clearly identified candidate. Such expenses must be paid from the federal account only. 11 CFR §106.7(c)(2)

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for allocated activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions, independent expenditures and coordinated expenditures) must be allocated between your committee's

federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. 11 CFR §106.1(a)

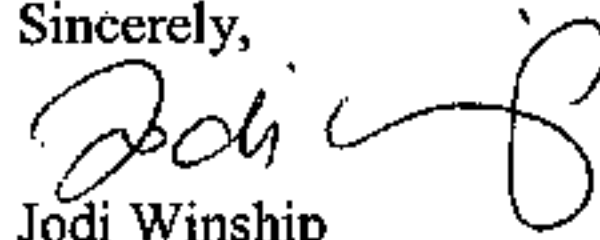
Please clarify the procedures you are currently using to pay for allocable expenses. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

-Schedule H3 of your report discloses negative entries for an apparent 'return of an incorrect transfer' made during a previous reporting period. If the original transfer(s) reported was deposited into your federal account and your committee disbursed a refund check from its federal account, this transaction should be disclosed on Schedule B, supporting Line 22 of the Detailed Summary Page. Please amend your report to properly disclose this activity or provide clarifying information.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1136.

Sincerely,



Jodi Winship
Campaign Finance Analyst
Reports Analysis Division

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